

LEAGUE OF WOMEN VOTERS OF CALIFORNIA

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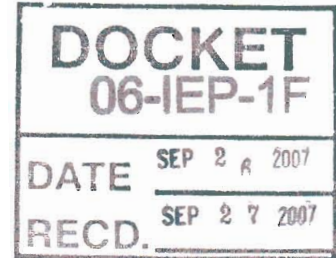
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September 26, 2007

The Honorable Jackalyne Pfannenstiel
The Honorable Jeffrey Byron
California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512



Re: Docket No. 06-IEP-1F
2007 IEPR—Transmission
Comments on the Draft 2007 Strategic Transmission Investment Plan

Dear Commissioners Pfannenstiel and Byron:

The League of Women Voters of California supports the efforts of the California Energy Commission to implement SB 1059 (Escutia and Morrow), which calls for the identification and establishment of transmission corridors that can remain in a utility's rate base for up to ten years. We also believe that the designation of areas unsuitable for transmission corridors on either federal or nonfederal lands at this time will remove some possible points of contention in the future.

Despite the decrease in transmission congestion over the past three years, the inability to bring power produced from remote renewable resources makes it evident that California's transmission infrastructure is seriously deficient. Two years ago the commission identified the need for transmission capacity to bring power from the wind, geothermal and solar sites east of the major load centers in Southern California. Yet, neither of the two proposed lines is fully permitted at this point. It appears that the investor-owned utilities will not be able to meet a Renewables Portfolio Standard of 20 percent by 2010. Although the issues related to renewables permitting involve the definition of new policy approaches, undertaking the reduction of greenhouse gas emissions in an expeditious time frame should make resolution of these concerns a top priority. More than eighteen months ago, the Independent System Operator, the Public Utilities Commission, and the Energy Commission drew up a plan for a coordinated process for planning and permitting. The proposal looked promising on paper. The League is disappointed that the promise has not materialized.

The Draft 2007 Strategic Transmission Investment Plan includes a promise of a more effective process with the establishment of CRETI—the California Renewable Energy Transmission Initiative. It is not evident how this initiative will reduce the conflicts related to land use for electric infrastructure. Renewable projects are a high priority, but improvements in the overall efficiency of the

system must also be valued. The real needs are to involve the stakeholders in the process early on and to institute a transparent strategic planning process with at least a ten-year time frame. The anticipatory designation of transmission corridors offers some hope that a viable siting process may yet be accomplished. Moreover, the siting of infrastructure corridors on federal lands, as called for under the federal Energy Policy Act of 2005, along with the exclusion of areas unsuitable for corridors, could help shape an effective process.

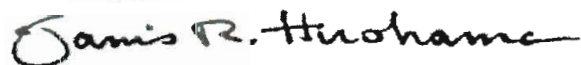
The League applauds the Public Interest Energy Research (PIER) program and Southern California Edison for the efforts that have been put into the development of PACT—Planning Alternative Corridors for Transmission Lines. This user-friendly and potentially powerful software program should certainly foster a less adversarial process when it comes to specific siting issues. Moreover, it should be an excellent tool for public education.

The draft report raises the topic of a possible incentive tariff for renewable generation as has been implemented in Europe. It appears that a market for tradable renewable energy credits (TRECs) that will put a value on the nonenergy attributes of renewable energy is likely to be created in California in the near future. Therefore, the League suggests that a decision regarding this incentive tariff be postponed until there is some understanding of the impacts of TRECs.

The League would like to commend the commission for its continuing efforts to foster regional approaches to planning. It is disappointing that very few cities or even counties in the state have responded to requests for information related to energy planning issues. We support local involvement in regional energy planning, and many local Leagues are making important efforts to raise community awareness regarding the specifics of greenhouse gas reduction. We hope that as cities become more aware of AB 32 requirements and commit to reducing their greenhouse gas emissions, their involvement in regional solutions will improve.

The League also supports California's leadership in the Western Electricity Coordinating Council (WECC). WECC takes us beyond our state borders, and with the Western Renewable Energy Generation Information System (WREGIS), the state now will participate in an ongoing exchange of valued energy commodities across a region that includes more than a third of our nation. Our state's transmission system does not end at our borders. California is part of a complex, integrated whole, and thus it is critical that we be an effective player in the collaboration amongst the western states. We would like California to be a leader in that collaboration, but until we get our own house in order, that doesn't seem feasible.

Sincerely,

A handwritten signature in black ink that reads "Janis R. Hirohama". The signature is fluid and cursive, with the first name "Janis" being the most prominent.

Janis R. Hirohama
President